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Attorneys for Plaintiff  
John Brown.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

JOHN BROWN,	)	Case No. 2:21-cv-00392-JAM-DMC
	)	
Plaintiff,	)	STIPULATION AND ORDER TO EXTEND
	)	DEADLINE TO FILE INITIAL
vs.	)	DISCLOSURES AND CLARIFYING
	)	PARTIES SERVED
TAKEUCHI MFG. CO. (U.S.), LTD, et al.	)	
	)	
Defendant(s).	)	Action Filed: March 3, 2021
	)	

WHEREAS, pursuant to the Court order, Plaintiff JOHN BROWN filed a First Amended Complaint on October 1, 2021;

WHEREAS, Defendants' filed responsive on May 19, 2022;

WHEREAS, John Brown, Takeuchi Mfg. Co. (USA), and United Rentals (North America) Inc., (hereinafter the "Parties") filed a joint scheduling report on May 20, 2022, requiring a filing of initial disclosure on August 19, 2022;

WHEREAS, Takeuchi Manufacturing Co., Limited was not served with the First Amended Complaint, and is a Japanese Corporation;

WHEREAS, the Parties have met and conferred regarding the deadlines provided in the joint scheduling report;

WHEREAS, the Plaintiff requested an extension to file his initial disclosure, and Defendants agreed to the request. The parties are requesting the Court to amend the joint

scheduling report to provide additional time to the parties to file initial disclosures by September 23, 2022.

WHEREAS, the Parties agree that written discovery can be served prior to the filing of initial disclosures on September 23, 2022.

ACCORDINGLY, IT IS SO STIPULATED, by and between the parties and through their counsel, as follows:

1. Parties' deadline to file initial disclosures be extended to September 23, 2022;
2. Parties can serve written discovery prior to the filing of initial disclosures.

Dated: August 19, 2022

ACQUEST LAW

/S/ Nareshwar Singh Viridi

Nareshwar S. Viridi  
Attorneys for Plaintiff  
John Brown

Dated: August 19, 2022

BOWMAN and BROOKE LLP

/S/ Neil Kliebenstein

Neil M. Kliebenstein  
Attorneys for Defendants  
Takeuchi Mfg. Co. (USA) Ltd.

Dated: August 19, 2022

GORDON & REES LLP

/S/ Russell M. Mortyn

Russell M. Mortyn  
Attorneys for Defendants  
United Rentals (North America) Inc.

IT IS SO ORDERED.

Dated: August 19, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE